

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case No.: 07-CV-07507 (SHS)

SPECIALTY NATIONAL INSURANCE )  
COMPANY, )  
Plaintiff, )  
-against- )  
ENGLISH BROTHERS FUNERAL HOME, )  
Defendant. )

**MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

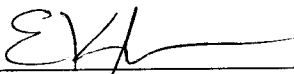
**PURSUANT TO RULE 1.3(c)** of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, John H. Somoza, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission *pro hac vice* of:

Robert Brunner, Esq.  
BOLLINGER, RUBERRY & GARVEY  
Specialty National Insurance Company  
500 West Madison Street, Suite 2300  
Chicago, Illinois 60661  
Tel. No.: (312) 466-8000

Robert Brunner is a member in good standing of the bars of the State of Illinois. There are no pending disciplinary proceedings against Robert Brunner in any State or Federal court.

Dated: January 22, 2008  
New York, New York

Respectfully submitted,

  
John H. Somoza (JHS-1801)  
Eleftherios Kravaris (EK-4579)  
Melito & Adolfsen P.C.  
233 Broadway—28th Floor  
New York, New York 10279  
Tel: (212) 238-8900  
Fax: (212) 238-8999

JAN 23 2008

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To: Tim Delahunt  
Kenney, Shelton, Liptak, Nowak, LLP  
*Attorneys for Defendant*  
Rand Building, Suite 510  
14 Lafayette Square  
Buffalo, New York 14203

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SPECIALTY NATIONAL INSURANCE	)
COMPANY,	)
Plaintiff,	)
-against-	)
ENGLISH BROTHERS FUNERAL HOME,	)
Defendant.	)

**AFFIRMATION IN SUPPORT OF  
JOHN H. SOMOZA IN SUPPORT  
OF MOTION TO ADMIT  
COUNSEL PRO HAC VICE**

State of New York    )  
                                  )       ss:  
County of New York   )

John H. Somoza, being duly sworn, hereby deposes and says as follows:

1. I am a member of Melito & Adolfsen P.C., counsel for plaintiff, Specialty National Insurance Company in the captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of plaintiff's motion to admit Robert Brunner of the law firm BOLLINGER, RUBERRY & GARVEY as counsel *pro hac vice* to represent plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and was admitted to practice law in New York on March 17, 1980. I am also admitted to the bar of the United States District Court for the Southern District of New York and am in good standing with this Court.

3. Robert Brunner is an attorney with the law firm of Bollinger, Ruberry & Garvey, located in Chicago, Illinois.

4. I have worked closely with Mr. Brunner's firm for more than seven years and during that time have found every one of the several attorneys with whom we have worked to be skilled attorneys of the highest integrity. I previously worked with Mr. Brunner in connection

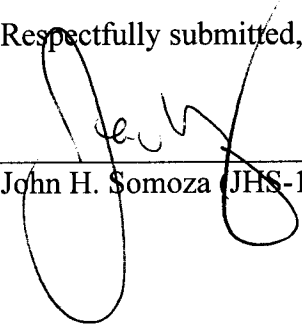
with another New York-based litigation and found Mr. Brunner also to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

5. Accordingly, I am pleased to move for the admission of Robert Brunner, *pro hac vice*.

6. I respectfully submit a proposed order granting the admission of Robert Brunner, *pro hac vice*, which is attached hereto as Exhibit A.

**WHEREFORE** it is respectfully requested that the motion to admit Robert Brunner, *pro hac vice*, to represent plaintiff in the captioned matter, be granted.

Respectfully submitted,



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John H. Somoza (JHS-1801)

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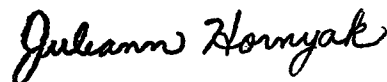
## **Certificate of Admission To the Bar of Illinois**

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Robert William Brunner, II

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on February 4, 1991 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto  
placed my hand and affixed the seal  
of said Supreme Court, at Springfield,  
in said State, this Monday, January 14, 2008.

A handwritten signature in black ink, reading "Juleann Hornyak". The signature is written in a cursive, flowing style.

Clerk

**CERTIFICATE OF SERVICE**

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF NEW YORK    )

I, Eleftherios Kravaris, hereby certify that on this 22<sup>nd</sup> day of January 2008, I caused true and correct copies of the foregoing **MOTION TO ADMIT COUNSEL PRO HAC VICE, AFFIRMATION IN SUPPORT OF JOHN H. SOMOZA IN SUPPORT OF MOTION TO ADMIT COUNSEL PRO HAC VICE with PROPOSED ORDER FOR ADMISSION PRO HAC VICE ON WRITTEN MOTION** to be served by First Class Mail upon:

Tim Delahunt  
Kenney, Shelton, Liptak, Nowak, LLP  
*Attorneys for Defendant*  
Rand Building, Suite 510  
14 Lafayette Square  
Buffalo, New York 14203

  
\_\_\_\_\_  
**ELEFTHERIOS KRAVARIS (EK-4579)**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

Case No.: 07-CV-07507 (SHS)

SPECIALTY NATIONAL INSURANCE )  
COMPANY, )  
Plaintiff, )  
-against- )  
ENGLISH BROTHERS FUNERAL HOME, )  
Defendant. )

**ORDER FOR ADMISSION PRO  
HAC VICE ON WRITTEN MOTION**

Upon the motion of John H. Somoza, Esq., attorney for plaintiff, Specialty National Insurance Company and said sponsor attorney's affidavit in support;

**IT IS HEREBY ORDERED that:**

Robert Brunner, Esq.  
BOLLINGER, RUBERRY & GARVEY  
Specialty National Insurance Company  
500 West Madison Street  
Suite 2300  
Chicago, Illinois 60661  
Tel. No.: (312) 466-8000  
robert.brunner@brg-law.net

is admitted to practice *pro hac vice* as counsel for plaintiff, Specialty National Insurance Company in the above captioned case in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of the Court.

Dated: \_\_\_\_\_, 2008

\_\_\_\_\_  
United States District/Magistrate Judge